

BACHNER & ASSOCIATES, P.C.

ATTORNEYS AT LAW

39 BROADWAY

SUITE 1610

NEW YORK, NEW YORK 10006

TELEPHONE: (212) 344-7778

FACSIMILE: (212) 344-7774

MICHAEL F. BACHNER*

HOWARD WEINER**

*ALSO ADMITTED IN NJ

**ALSO ADMITTED IN CALIFORNIA AND NJ

www.bhlawfirm.com

www.bachnerlaw.com

NEW JERSEY OFFICE

175 FAIRFIELD AVENUE

SUITE 3D

WEST CALDWELL, N.J. 07006

TEL: (973) 403-9550

July 11, 2019

The Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Jason Nissen, 17 Cr. 477 (PAE)

Dear Judge Engelmayer:

I am writing to respectfully request a *final* two-week adjournment to submit our joint sentencing memorandum. I do not make this request lightly in view of your Honor's June 20, 2019 Order ("The parties should not expect further adjournments.") Counsel for the Government and the defense have been working diligently to complete our joint submission. This afternoon, the Government provided the defense with a revised draft submission for comment. The draft contained new information based upon a recent interview with NECO's former CFO which the defense now needs time to reply to. We also need to speak with to Kroll about several issues raised in the letter, and we are awaiting documents from American Express necessary to our analysis. Tomorrow is a lost date for me personally. I have a long-scheduled medical procedure which will make it impossible for me to focus on this matter.

The parties have been working very hard to finalize a joint submission. The additional final two weeks I am requesting will allow us to resolve most, if not all of our issues. Of course, if we can submit our letter sooner, we will.

BACHNER & ASSOCIATES, P.C.

Accordingly, Mr. Nissen respectfully requests a final 14-day adjournment to July 29, 2019, at which point the parties will submit their findings to the Court. The government consents to this request.

Respectfully,

Michael Bachner

Michael Bachner

MFB/jl

Cc: AUSA Doug Zolkind

AUSA Lara Pomerantz